

EXHIBIT B

Natasha L. Johnston

From: Eric L. Christensen
Sent: Thursday, July 30, 2020 10:23 AM
To: Kathryn R. McKinley
Cc: Natasha L. Johnston
Subject: RE: Date for Production of Documents

Agreed. Thanks.

Eric L. Christensen

Of Counsel

BEVERIDGE & DIAMOND PC

O +1.206.620.3025 ~ EChristensen@bdlaw.com

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From: Kathryn R. McKinley <Kathryn.McKinley@painehamblen.com>
Sent: Thursday, July 30, 2020 10:13 AM
To: Eric L. Christensen <EChristensen@bdlaw.com>
Cc: Natasha L. Johnston <NJohnston@bdlaw.com>
Subject: RE: Date for Production of Documents

Eric:

I do not have a response from my client yet, but suggest that we agree on September 4, since we are already more than 2 weeks past the date on which we agreed to August 21. And again, subject to my previously stated caveats.

Your courtesy will be appreciated.

Kathryn R McKinley
Paine Hamblen LLP
509.455.6017

From: [Eric L. Christensen](#)
Sent: Tuesday, July 28, 2020 1:28 PM
To: [Kathryn R. McKinley](#)
Cc: [Natasha L. Johnston](#)
Subject: RE: Date for Production of Documents

Kathryn,

We are finally getting the discovery completed and expect to file today or tomorrow. In light of the delay, I want to see if August 28 would work as a due date for you, rather than August 21, subject to the caveats discussed below.

Thanks!

Eric L. Christensen

BEVERIDGE & DIAMOND PC

O +1.206.620.3025 ~ EChristensen@bdlaw.com

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From: Kathryn R. McKinley <Kathryn.McKinley@paineamblen.com>

Sent: Wednesday, July 15, 2020 2:52 PM

To: Eric L. Christensen <EChristensen@bdlaw.com>

Cc: Natasha L. Johnston <NJohnston@bdlaw.com>

Subject: RE: Date for Production of Documents

Eric:

I've heard back from Gary Ivory now and, as I previously indicated, August 21 should work for the due date on the document production. This is, of course, dependent on the timeliness of receipt of the production requests and the scope. Based on your email, it sounds like we will be receiving the requests within a few days, so there should be no problem from that standpoint. As far as scope goes, the PUD, like many businesses, is working with reduced staffing, so the volume of documents responsive to your request may impact the timing of production. We will let you know as soon as possible if that looks like it will be an issue.

Thank you,

Kathryn R. McKinley

Partner

PAINE  HAMBLEN™

717 W Sprague Ave, Ste 1200

Spokane, WA 99201-3505

509.455.6017

kathryn.mckinley@paineamblen.com

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From: Eric L. Christensen [<mailto:EChristensen@bdlaw.com>]

Sent: Tuesday, July 14, 2020 2:17 PM

To: Kathryn R. McKinley <Kathryn.McKinley@paineamblen.com>

Cc: Natasha L. Johnston <NJohnston@bdlaw.com>

Subject: Date for Production of Documents

Good afternoon, Kathryn,

I understand that you represent Douglas County PUD in the GigaWatt bankruptcy matter. As I believe you are aware, I have been retained by Mark Waldron, the trustee for the GigaWatt bankruptcy estate, to investigate the Douglas PUD's contracts involving GigaWatt's site at the Pangborn Airport Business Park. In accordance with the Eastern District's Local Bankruptcy Rule 2004-1, I'd like to coordinate the time and place for production of the documents. I will be filing the motions in the next few days. Hence, I suggest August 21 as the due date for document production.

Please let me know if that works.

Eric L. Christensen
Of Counsel



600 University Street, Suite 1601 ~ Seattle, WA 98101 ~ bdlaw.com

~ +1.206.620.3025 ~ EChristensen@bdlaw.com

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